

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP, BI-LEVEL PAP,
AND MECHANICAL VENTILATOR PRODUCTS
LITIGATION

IN RE: SOCLEAN, INC. MARKETING, SALES
PRACTICES AND PRODUCTS LIABILITY
LITIGATION

This document relates to:

*Koninklijke Philips N.V. et al. v. SoClean, Inc. & DW
Mgmt. Servs., LLC*
(MDL 3014, ECF No. 2922)

Master Docket Nos. 21-mc-1230
and 22-mc-152

MDL Nos. 3014 and 3021

Philips RS North America LLC v. SoClean, Inc. et al.
(MDL 3021, ECF No. 653)

*Koninklijke Philips N.V. et al. v. SoClean, Inc. & DW
Mgmt. Servs., LLC*
(MDL 3021, ECF No. 507)

SoClean, Inc. v. Koninklijke Philips N.V. et al.
(MDL 3021, ECF No. 211)

**MOTION FOR ENTRY OF SCHEDULING ORDER GOVERNING ALL LITIGATION
BETWEEN THE PHILIPS PARTIES AND THE SOCLEAN PARTIES**

There are four litigation tracks between the various Philips, SoClean and DW parties: (1) SoClean's affirmative claims (MDL 3021, ECF No. 211), (2) Philips' counterclaims (MDL 3021, ECF No. 507), (3) Philips' contribution claims (personal injury) (MDL 3014, ECF 2922)), and (4) Philips' assigned claims (property damage economic loss) (MDL 3021 ECF No. 653). The parties have engaged in extensive discussions, overseen by Special Master Katz, to attempt to reach agreement on a scheduling order to govern these proceedings. However, the parties were unable to reach agreement on a joint schedule. A number of significant areas of disagreement remain.

The attached schedule (Ex. 1) is the parties' attempt to lay out their proposals and the disputes that remain. In addition, because the various footnotes in the attachment have become somewhat unwieldy, the Philips parties are submitting a separate brief (Ex. 2) laying out their positions on each disputed item. The SoClean and DW parties have declined to file a separate brief at this time.

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Respectfully submitted,

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